

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Peter St. Laurent

Plaintiff

v.

UNITED PARCEL SERVICE, INC.

Defendant

Civil Action No. 04-11951-NG

**AFFIDAVIT OF NEAL ROSSI IN SUPPORT OF**  
**UNITED PARCEL SERVICE INC.'S**  
**MOTION FOR SUMMARY JUDGMENT**

I, Neal Rossi, state that the following is true and accurate based upon my personal information and belief:

1. I have been employed with United Parcel Service Inc. ("UPS") for 20 years. I am currently employed as the Public Affairs Manager for the UPS East New England District.

2. Package Car Drivers at UPS are represented by the Teamsters Union. UPS and the Teamsters have entered into a collective bargaining agreement that governs the terms of employment for UPS Package Car Drivers. Portions of this collective bargaining agreement are attached as Exhibit A.

3. Attached as Exhibit B is a true and accurate copy of the Essential Job Functions for a Package Car Driver at UPS.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY ON THIS THE 27  
DAY OF MAY, 2005



Neal Rossi  
UPS Public Affairs Manager